

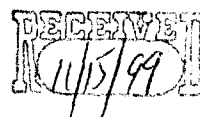


75 West Center • Provo, Utah 84601-4483  
tel 801-345-9800 • fax 801-345-9899  
www.pharmanex.com

By Federal Express

November 9, 1999

Office of Special Nutritionals (HFS-450)  
Center for Food Safety and Applied Nutrition  
U.S. Food and Drug Administration  
200 C St. SW  
Washington, DC 20204



RE: Notification for Certain Types of Statements on Dietary Supplements

Dear Sir or Madam:

As required by Section 403 (r)(6)(c) of the Food, Drug and Cosmetic Act, Pharmanex, Inc., 2000 Sierra Point Parkway, Brisbane, California 94005, intends to market a dietary supplement product with the following label statements of nutritional support:

Product identified as **Hair Formula** with the following label statements:

- *Promotes beauty from the inside out.*
- *Nutritional building blocks for healthy hair and nails.*
- *Provides the key nutritional building blocks to promote and maintain healthy hair and nails.*
- *Supplies the optimum amounts of the sulphur-containing amino acids cysteine and methionine for keratin production. Keratin is the major structural protein of hair.*
- *Hair Formula delivers a special blend of nourishing ingredients necessary to keep hair looking healthy.*

I certify that the information contained in this notice is complete and accurate and that Pharmanex, Inc. has substantiation that these statements are truthful and not misleading.

Sincerely,

A handwritten signature in black ink, appearing to read 'C. Smidt'.

Carsten Smidt  
Director of Nutrition Research

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